

# **EXHIBIT 10**

Page 1

1 STATE OF MICHIGAN

2 IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

3 \_\_\_\_\_  
4 LINT CHIROPRACTIC, DIAGNOSTIC  
5 CHIROPRACTIC MI, P.C., and  
6 SUPPLIES PLUS MI, LLC.,

7 Plaintiffs,

8 v.

Case No.

9 THE LIBERTY SURPLUS INSURANCE, 22-014214-NF  
10 CORPORATION, a foreign insurance  
11 corporation,

12 Defendant.

13 \_\_\_\_\_  
14 VIDEOCONFERENCE DEPOSITION OF

15 JULIE STRIEF

16 DATE: Wednesday, October 11, 2023

17 TIME: 2:01 p.m.

18 LOCATION: Remote Proceeding

19 Southfield, MI 48075

20 REPORTED BY: Priscilla Gibbs, Notary Public

21  
22  
23  
24  
25 Job No. CS6109209

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1 A P P E A R A N C E S

2 ON BEHALF OF PLAINTIFFS LINT CHIROPRACTIC, DIAGNOSTIC  
3 CHIROPRACTIC MI, P.C., AND SUPPLIES PLUS MI, LLC:

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11 ON BEHALF OF DEFENDANT THE LIBERTY SURPLUS INSURANCE  
12 COMPANY:

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1	I N D E X	
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7	E X H I B I T S		
8	NO.	DESCRIPTION	PAGE
9		(None marked.)	
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1 P R O C E E D I N G S

2 THE REPORTER: Good afternoon. My name  
3 is Priscilla Gibbs; I am the reporter assigned by  
4 Veritext to take the record of this proceeding. We  
5 are now on the record at 2:01.

6 This is the deposition of Julie Strief  
7 taken in the matter of Lint Chiropractic, Diagnostic  
8 Chiropractic Michigan PC, and Supplies Plus Michigan  
9 LLC vs. Liberty Surplus Insurance Corporation,  
10 a foreign insurance corporation, on Wednesday, October  
11 11, 2023, via Zoom.

12 I am a notary authorized to take  
13 acknowledgments and administer oaths in Michigan.  
14 Parties agree that I will swear in the witness  
15 remotely.

16 Additionally, absent an objection on  
17 the record before the witness is sworn, all parties  
18 and the witness understand and agree that any  
19 certified transcript produced from the recording of  
20 this proceeding:

21 - is intended for all uses permitted  
22 under applicable procedural and  
23 evidentiary rules and laws in the same  
24 manner as a deposition recorded by  
25 stenographic means; and

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1                   - shall constitute written stipulation  
2                   of such.

3                   At this time will everyone in  
4                   attendance please identify yourself for the record,  
5                   starting with the taking attorney.

6                   MR. LANKFORD: David Lankford on behalf  
7                   of Steven Braun for Defendant.

8                   MR. EKLEBERRY: James Ekleberry  
9                   appearing on behalf of Plaintiffs.

10                  THE REPORTER: Thank you.

11                  Hearing no objection, I will now swear  
12                  in the witness.

13                  Please raise your right hand. I'm  
14                  sorry, I can't see if you're raising your right hand.  
15                  WHEREUPON,

16                  JULIE STRIEF,  
17                  called as a witness, and having been first duly sworn  
18                  to tell the truth, the whole truth, and nothing but  
19                  the truth, was examined and testified as follows:

20                  THE REPORTER: Thank you.

21                  EXAMINATION

22                  BY MR. LANKFORD:

23                  Q        Hi Doctor. Your full name is Julie Ann,  
24                  A-N-N, Strief, S-T-R-I-E-F; correct?

25                  A        Correct.

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1 Q You're a licensed chiropractor in the state  
2 of Michigan; true?

3 A True.

4 Q And you've been licensed since about 1997,  
5 according to the state website; correct?

6 A Correct.

7 Q Have you ever had any actions taken against  
8 your license?

9 A No.

10 Q Where do you currently work?

11 A Lint Chiropractic.

12 Q How long have you been there?

13 A About a year and a half.

14 Q Where did you work prior to Lint  
15 Chiropractic?

16 A I was self-employed.

17 Q So you had your own practice?

18 A No. I covered for doctors that went on  
19 vacation, so I traveled all over the state of Michigan  
20 in a number of different offices.

21 Q Did you have your own company to do that or  
22 were you working with a case finding company?

23 A People contacted me because I had an ad in  
24 the Michigan Chiropractic Association Journal.

25 Q Just to do coverage work, is that it?

Page 7

1 A Correct.

2 Q And so you were paid as essentially a 1099  
3 person when you were doing that coverage work?

4 A Correct.

5 Q Since you've been over at Lint, what is your  
6 position there; are you an employee there or a  
7 contractor or what?

8 A At first I was a contractor and now I'm an  
9 employee.

10 Q About how long were you a contractor for  
11 Lint?

12 A Probably about a year.

13 Q And you said now you're an employee; are you  
14 a full-time employee or something else?

15 A Full time.

16 Q And how many hours a week or how many  
17 patients per week is full time for you at Lint?

18 MR. EKLEBERRY: Compound question, but  
19 you can answer.

20 THE WITNESS: It's five days a week.

21 BY MR. LANKFORD:

22 Q So full time is defined by a number of hours  
23 or number of days?

24 A Yes.

25 Q Do you have any parameters on how many

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1 patients you need to see during your five-day-a-week?

2 A No.

3 MR. EKLEBERRY: Foundation.

4 BY MR. LANKFORD:

5 Q Do you have anything to do with referrals  
6 coming in to Lint in terms of you're out looking for  
7 patients?

8 A No, I don't.

9 Q How are cases assigned to you?

10 A Patients walk in the door and I see them.

11 Q Are you always the intake for your own  
12 patients or do you see other doctors' patients as  
13 well?

14 MR. EKLEBERRY: Objection. Form.

15 Go ahead.

16 THE WITNESS: Both. We have two  
17 doctors here, and if I'm not here the other doctor  
18 will see them.

19 BY MR. LANKFORD:

20 Q Do you have your own patient caseload or is  
21 it the available doctor for whoever's there on a  
22 particular day?

23 A It's for whoever's available.

24 Q Do you have a particular supervisor?

25 A Yes.

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1 Q Who's that, please?

2 A Rob Super.

3 Q And for what sorts of things do you have to  
4 answer to Dr. Super?

5 A If I've got questions or he's got questions  
6 about something, I'll ask him or he'll ask me.

7 Q Does he have to review any of your work, do  
8 you know?

9 A Sometimes he does.

10 Q Is that part of his supervisory role or  
11 another role he has at Lint, if you know?

12 A I don't know for sure.

13 Q Other than examination and manual therapy,  
14 do you do any other services at Lint?

15 A No.

16 Q Are you working anywhere other than Lint  
17 right now?

18 A No, I'm not.

19 Q When did you first come to see Monique  
20 Beckham at Lint Chiropractic?

21 A I believe it was October 19, 2022.

22 Q What was your task on that date regarding  
23 Ms. Beckham?

24 A To do an exam on her.

25 Q Had she already been a patient at Lint, if

Page 10

1 you know?

2 A I don't believe so.

3 Q So this was the intake visit as far as you  
4 know?

5 A Yes.

6 Q About how long did that initial visit take  
7 on October 19, 2022?

8 A Probably about a half hour.

9 Q What's comprised of your initial examination  
10 on someone like Ms. Beckham?

11 A I ask them questions, find out where they're  
12 having pain, have them describe it, perform range of  
13 motion orthopedic exam, palpation. If they need to  
14 have muscle testing, I'll do muscle testing. Check  
15 their reflexes if I feel it's necessary. A typical  
16 chiropractic exam.

17 Q If you recall or if there's a document there  
18 to remind you, did you do all of those things on  
19 Ms. Beckham on October 19, 2022?

20 A I did orthopedic tests. Range of motion. I  
21 did not do muscle testing or reflexes.

22 Q What about palpation?

23 A Yes.

24 Q Anything else in that initial exam other  
25 than range of motion, orthopedic exam and palpation?

Page 11

1 A No, I do not believe.

2 Q Did you do any manual adjustments for  
3 Ms. Beckham on that first visit?

4 A It does not look like it.

5 Q Does the record indicate the referral source  
6 of Ms. Beckham over to Lint from any person or any  
7 facility?

8 A Can you repeat that?

9 Q Sure. You said that you thought this was  
10 the initial visit for Ms. Beckham. Does your record  
11 indicate a referral source or how Ms. Beckham got to  
12 Lint Chiropractic?

13 A No, it does not.

14 Q Are you familiar with the name of Shelby  
15 Glazier?

16 A No.

17 Q I'm looking at a document, looks like it's  
18 dated October 19, 2022, for Ms. Beckham, and it says  
19 "Referring physician," it has your name, and it is a  
20 referral for trigger point impedance --  
21 I-M-P-E-D-A-N-C-E -- imaging and localized intense  
22 neurostimulation therapy if necessary. And then your,  
23 looks like your signature at the bottom.

24 Do you have that document in front of you?

25 A Yes, I do.

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1 Q And it looks like there are four options on  
2 the preprinted form, for thoracic spine pain, thoracic  
3 myofascitis, lumbar spine pain and lumbosacral  
4 myofascitis; correct?

5 A Correct.

6 Q And you made that referral for those two  
7 therapies on that date; true?

8 A True.

9 Q When you did your examination of  
10 Ms. Beckham, did you find any other areas of her body  
11 were either complained of or that you diagnosed as a  
12 focus for treatment other than thoracic lumbar or  
13 lumbosacral?

14 A Neck pain.

15 Q Why was there no referral option for trigger  
16 point impedance imaging or localized intense  
17 neurostimulation therapy for cervical for Ms. Beckham?

18 A Because that machine does not do -- does not  
19 treat the cervical.

20 Q What does that machine do?

21 A It treats trigger points.

22 Q How does it treat it?

23 A It detects it. And then the pins or needles  
24 will go into the muscle to put stimulation into the  
25 muscle to break up the trigger point.

Page 13

1 Q So when you say a needle goes into the  
2 muscle, it's an invasive tool; correct?

3 A It is not a needle. It's a pin that's  
4 attached to the machine.

5 Q Does it break the skin?

6 A No, it does not. It puts pressure on the  
7 muscle.

8 Q When you do your range of motion, orthopedic  
9 and palpation exam, do you already identify trigger  
10 points?

11 A Some trigger points I could pick up, but not  
12 all trigger points.

13 Q Did you use any devices when you were doing  
14 your hands-on examination of Ms. Beckham, an activator  
15 or any other tool?

16 A No, I did not.

17 Q So you're picking up trigger points and any  
18 anomalies by touch; correct?

19 A Correct.

20 Q Did you order any x-rays for Ms. Beckham?

21 A No, I did not.

22 Q Other than the two diagnostic tests we  
23 started talking about, did you order any other  
24 diagnostic testing for Ms. Beckham?

25 A Not on October 19th.

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1 Q Did you at any other time?

2 A At the end of her treatment I recommended an  
3 MRI.

4 Q What date do you have as the end of her  
5 treatment?

6 A Her last day that she came in to see us, I  
7 believe, is 4/3 of '23.

8 Q Why did you order an MRI on that date?

9 A Because she still had pain.

10 Q What was your purpose in ordering an MRI.

11 MR. EKLEBERRY: Asked and answered.

12 Go ahead.

13 THE WITNESS: To rule out any disc  
14 herniations.

15 BY MR. LANKFORD:

16 Q Are disc herniations within your scope of  
17 practice as a chiropractor?

18 A Yes.

19 Q So your scope of practice is beyond treating  
20 subluxations, is that your testimony?

21 MR. EKLEBERRY: Mischaracterizes the  
22 record.

23 You can answer, Doctor.

24 THE WITNESS: Yes.

25 //

Page 15

1 BY MR. LANKFORD:

2 Q Beyond subluxations, what else is included  
3 in your scope of practice by your testimony?

4 MR. EKLEBERRY: Objection to form and  
5 foundation.

6 Doctor, go ahead.

7 THE WITNESS: Can you repeat the  
8 question?

9 MR. LANKFORD: Sure.

10 Ms. Gibbs, can you read it back,  
11 please.

12 (The reporter played the record as  
13 requested.)

14 THE REPORTER: You may continue.

15 THE WITNESS: We can treat disc  
16 herniations, subluxations, muscle tightness, trigger  
17 points, extremities. A number of things.

18 BY MR. LANKFORD:

19 Q When you say a number of things, what else?

20 MR. EKLEBERRY: Same objection, but go  
21 ahead, Doctor.

22 THE WITNESS: I think I've covered all  
23 of them that I treat.

24 BY MR. LANKFORD:

25 Q Who operates the trigger point impedance

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1 imaging and localized intense neurostimulation therapy  
2 machine for Ms. Beckham?

3 A I'm not sure at that time who was working.

4 Q Did you ever operate the machine for  
5 Ms. Beckham for any of the times that you saw her  
6 based upon this October 19, 2022 referral?

7 A No, I did not.

8 Q Are you trained to operate the machine?

9 A No, I'm not.

10 Q Who at Lint would have been the possible  
11 individuals who would have operated this machine for  
12 Ms. Beckham, if you know?

13 A I'm not sure.

14 Q What was your purpose for making the  
15 referral for this machine if you don't know how it  
16 operates?

17 MR. EKLEBERRY: Lack of foundation.

18 Mischaracterizes the record.

19 Go ahead, Doctor.

20 THE WITNESS: I know how it works.

21 BY MR. LANKFORD:

22 Q What was your purpose for making the  
23 referral?

24 A The purpose? So that we could treat  
25 Ms. Beckham's muscles and her spine to help with the

Page 17

1 subluxations and the pain she was in.

2 Q What subluxations did you identify for  
3 Ms. Beckham on October 19, 2022?

4 A C5/6, C6/7, T5/6, T6/7, and L4/5 and L5/S1.

5 Q And how did you make those diagnoses?

6 A By palpation.

7 Q Did anybody share the results of this  
8 machine use with Ms. Beckham after it was utilized  
9 with her?

10 A No.

11 Q Do you know anything about the coding or  
12 billing for the services you rendered for Ms. Beckham?

13 A I have no clue.

14 Q So if I told you about CPT codes, would you  
15 know what they mean or not really?

16 A Not really.

17 Q How do you record the services you provided  
18 to Ms. Beckham, either diagnostic or treatment; is  
19 there a sheet you fill out, a computer that you use?  
20 How do you record what you do?

21 A On paperwork.

22 Q What kind of paperwork do you have to  
23 complete for patients such as Ms. Beckham when you see  
24 them?

25 A A SOAP note.

Page 18

1 Q Is that something you write or do you  
2 dictate it?

3 A I write it.

4 Q And by "write," these days, I think  
5 everybody understands you would be keying it in and  
6 not hand writing it?

7 A No, I hand write it.

8 Q So there are handwritten notes?

9 A Yeah, that I check stuff off of.

10 Q Okay. Is that a preprinted form that you  
11 check stuff off of or are you handwriting a narrative,  
12 or both?

13 A It's a pre-written form that I check stuff  
14 off of.

15 Q Do you know where that form is from?

16 A I have no idea.

17 Q Was that form in place when you started at  
18 Lint about a year and a half ago?

19 A Yes.

20 Q Is there a space to add something if it's  
21 not on the preprinted form?

22 A Yes.

23 Q And then do you know how that form is turned  
24 into a bill, or don't you know?

25 A I have no clue.

Page 19

1 Q So you write out your information on this  
2 form; where does the form then go, if you know?

3 A I hand it to the front desk and I don't know  
4 where it goes after that.

5 Q Fair to say you don't --

6 A I'm assuming in their files.

7 Q Fair to say that you have no idea how  
8 charges are set for each code for the services that  
9 you rendered to Ms. Beckham?

10 A No, I don't.

11 Q I have a date, I don't know what happened on  
12 the date of October 28, 2022, where you're listed as  
13 seeing Ms. Beckham; do you have a note or some  
14 reference to that date?

15 A October what was that?

16 Q I have 28, 2022.

17 A I have one for the Nervomatrix, but no note  
18 for myself.

19 Q Okay. How about for November 4, 2022?

20 A Yes.

21 Q What did you do with Ms. Beckham on November  
22 4, 2022?

23 A I adjusted C5/6, 6/7, T5/6, T6/7, L3/4. And  
24 I did some manual treatment.

25 Q I'm sorry, I missed the last thing you said.

Page 20

1 A I adjusted and did some manual therapy.

2 Q Got it.

3 Any Nervomatrix on that day, November 4,  
4 2022?

5 A I didn't do that.

6 Q The next date --

7 A But --

8 Q Sure, I'm sorry, go ahead.

9 A She did receive Nervomatrix on that day.

10 Q Any contraindication for manual adjustment  
11 and Nervomatrix on the same date that you are aware  
12 of?

13 A Nope.

14 Q The next date I have is November 11, 2022;  
15 what did you do with Ms. Beckham on that date?

16 A I adjusted C4/5, C5/6, T4/5, T5/6, and I did  
17 some manual therapy.

18 Q What other dates did you see Ms. Beckham?  
19 Those are the only four that I found. I think you  
20 gave us April 3, 2023.

21 A Yes.

22 Q Anything between November 11 and May 3,  
23 2023, that you find?

24 A No. I have -- no.

25 Q So it looks like those are the five dates;

Page 21

1           correct?

2           A       Yes.

3           Q       You gave me a brief description on how the  
4       Nervomatrix system works. You said it was pins that  
5       applied pressure to trigger points; correct?

6           A       Correct.

7           Q       How else does that machine work, if you  
8       know?

9                   MR. EKLEBERRY: Objection to form, but  
10      you can answer.

11                  THE WITNESS: Just that it treats  
12      trigger points.

13      BY MR. LANKFORD:

14           Q       Through the pressure pin method you told us  
15      about; correct?

16           A       Yes.

17           Q       Does it affect your treatment, your manual  
18      treatment with Ms. Beckham at all, what happens with  
19      that machine?

20           A       Well, the Nervomatrix will get the muscles  
21      to relax to hold the adjustment and make it easier to  
22      adjust a patient.

23           Q       So is that done before or after your manual  
24      therapy?

25           A       The Nervomatrix is done before the manual

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1       therapy -- or the adjustments and manual therapy, yes.

2           Q     You said on October 28, 2022, it was  
3     Nervomatrix only, so you didn't do any manual  
4     adjustment on that date?

5           A     On what date?

6           Q     October 28, 2022. Because I thought you  
7     said Nervomatrix only. I wanted to verify that.

8           A     Yes, that's correct.

9           Q     Was any Nervomatrix done on October 19,  
10    2022, your initial visit with Ms. Beckham, or that's  
11    just the time you made the referral?

12          A     Yes, there was Nervomatrix done on that day.

13          Q     Does the involvement of the Nervomatrix  
14    change your treatment planning or diagnostic  
15    impressions for Ms. Beckham at all?

16          A     No.

17          Q     In the absence of the Nervomatrix, is there  
18    another method to allow your adjustment, as you said,  
19    to hold better, that would be used before treatment?

20                   MR. EKLEBERRY: Form and foundation.

21                   Doctor, you can answer.

22                   THE WITNESS: Not anything that would  
23    be as effective.

24                   BY MR. LANKFORD:

25          Q     My question was, was there any -- is there

Page 23

1 any other option.

2 A And I said no, nothing that would be as  
3 effective as the Nervomatrix.

4 Q What are the other options that would be  
5 less effective?

6 A Manual treatment of the trigger points.

7 Q Heat, or no?

8 A I usually don't use heat. Because heat  
9 brings more swelling and inflammation to an area.

10 Q How about cold?

11 A If someone is acute and I've finished  
12 treating them, I will use cold on them.

13 Q But that would be after your treatment;  
14 correct?

15 A Correct.

16 Q So the treatment for Ms. Beckham from you  
17 not involving the Nervomatrix would be cervical only;  
18 is that fair?

19 MR. EKLEBERRY: Mischaracterizes the  
20 record.

21 Go ahead, Doctor, you can address the  
22 question.

23 THE WITNESS: No, I would be treating  
24 the thoracic and lumbar as well.

25 //

Page 24

1 BY MR. LANKFORD:

2 Q My question was, treatment areas not  
3 involving the Nervomatrix from you would be cervical  
4 only; correct?

5 A Oh, correct.

6 MR. EKLEBERRY: Mischaracterizes the  
7 record.

8 BY MR. LANKFORD:

9 Q Did you treat any areas of Ms. Beckham's  
10 body other than her spinal column from cervical  
11 through lumbosacral?

12 A No, I don't believe I did.

13 Q When you said that you referred her for an  
14 MRI as of April 3, 2023, was that the last time she  
15 came in or was she discharged, if you know?

16 A That was the last time she came in.

17 Q Do you know what her treatment status was as  
18 of April 3, 2023, or can you tell from the record?

19 A I don't know.

20 Q Was she seen after that day, or that was the  
21 last date you saw her?

22 A That was the last date she came in.

23 Q Did you refer her to someplace specific for  
24 an MRI or just get an MRI?

25 A I referred her to Northland Radiology.

Page 25

1 Q Why specifically Northland Radiology?

2 A Because that was right down the street from  
3 us.

4 Q What areas of her body did you refer her to  
5 get MRIs upon?

6 A Her thoracic area.

7 Q Thoracic only?

8 A Yes.

9 Q Did you give her a choice to go anywhere  
10 else or you just sent her over to Northland?

11 A I just sent her over to Northland.

12 Q Do you have any information in your file  
13 whether she went?

14 A No, I do not.

15 MR. LANKFORD: I don't have any other  
16 questions for you. Thank you, Doctor.

17 MR. EKLEBERRY: Doctor, I've got a  
18 couple of follow up questions for you.

19 EXAMINATION

20 BY MR. EKLEBERRY:

21 Q First, you've described a number of  
22 interactions that you've had, or had with Ms. Beckham  
23 over the course of your treatment. When you interact  
24 with a patient, do you record those interactions in  
25 the form of a medical record?

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1 A In a SOAP note, yes.

2 Q Does that SOAP note get converted to an  
3 electronic medical record that becomes part of Lint's  
4 patient chart?

5 A I'm not sure how they -- you know, I just  
6 have the paper file.

7 Q Okay. Does Lint, or do you as an employee  
8 of Lint, maintain patient records documenting your  
9 interactions with each patient?

10 A In regard to our conversations or how I  
11 treated them?

12 Q Interactions and treatment.

13 A Just a SOAP note.

14 Q When you make conclusions about a patient's  
15 injury or the origin of said injury, do you make those  
16 conclusions to a reasonable degree of chiropractic  
17 certainty?

18 A Yes.

19 Q And did you make any conclusions about the  
20 origin of Ms. Beckham's injuries?

21 A Yeah, they started in her spine from the  
22 auto accident.

23 Q When you say the auto accident, are you  
24 referring to the March 19, 2022, auto accident?

25 A Yes.

Page 27

1 Q And is it your opinion that the treatment  
2 you provided to Ms. Beckham was both reasonable and  
3 necessary?

4 A Yes.

5 MR. EKLEBERRY: Thank you, Doctor,  
6 those are all the questions I have for you at this  
7 time.

8 MR. LANKFORD: Couple of follow-ups for  
9 you, Dr. Strieff.

10 EXAMINATION

11 BY MR. LANKFORD:

12 Q At the time you saw Ms. Beckham for the  
13 first time on October 19, 2022, what other  
14 documentation or evidence did you have before you to  
15 supplemental what she told you about her injury or the  
16 origin of it?

17 MR. EKLEBERRY: Form and foundation.

18 Go ahead, Doctor.

19 THE WITNESS: I mean, my exam findings.

20 BY MR. LANKFORD:

21 Q Did you have any other documentation  
22 regarding Ms. Beckham at all the first time you saw  
23 her?

24 A No.

25 Q Did you rely solely upon her statements to

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1 you about her symptoms and the possible causation of  
2 them?

3 A Yes.

4 MR. EKLEBERRY: Form and foundation.

5 BY MR. LANKFORD:

6 Q Now, following the time that you saw  
7 Ms. Beckham on October 19, 2022, did you ever request  
8 or receive any other records of any sort to verify the  
9 reports that Ms. Beckham gave to you?

10 A No, I did not.

11 MR. LANKFORD: Nothing further for me  
12 right now.

13 MR. EKLEBERRY: No further questions at  
14 this time.

15 MR. LANKFORD: I think we're all set.

16 Miss Court Reporter, do you need  
17 spellings of any sort?

18 THE REPORTER: Yes, I do.

19 First, do we have any orders for this  
20 witness?

21 MR. LANKFORD: Yes, could you send an  
22 electronic copy to Mr. Braun, please.

23 THE REPORTER: All right.

24 How about you, Counsel?

25 MR. EKLEBERRY: I'll also take an

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1 e-trans, please, and thank you.

2 THE REPORTER: All right. The time is  
3 2:40, we're now off the record.

4 (Whereupon, at 2:40 p.m., the  
5 proceeding was concluded.)

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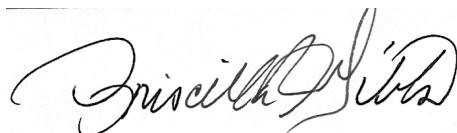
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1 CERTIFICATE OF DEPOSITION OFFICER

2 I, PRISCILLA GIBBS, the officer before whom  
3 the foregoing proceedings were taken, do hereby  
4 certify that any witness(es) in the foregoing  
5 proceedings, prior to testifying, were duly sworn;  
6 that the proceedings were recorded by me and  
7 thereafter reduced to typewriting by a qualified  
8 transcriptionist; that said digital audio recording of  
9 said proceedings are a true and accurate record to the  
10 best of my knowledge, skills, and ability; that I am  
11 neither counsel for, related to, nor employed by any  
12 of the parties to the action in which this was taken;  
13 and, further, that I am not a relative or employee of  
14 any counsel or attorney employed by the parties  
15 hereto, nor financially or otherwise interested in the  
16 outcome of this action



17 PRISCILLA GIBBS

18 Notary Public in and for the  
19 State of Michigan

20  
21  
22  
23  
24  
25

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1 CERTIFICATE OF TRANSCRIBER

2 I, CHERYL MCKINNEY, do hereby certify that  
3 this transcript was prepared from the digital audio  
4 recording of the foregoing proceeding, that said  
5 transcript is a true and accurate record of the  
6 proceedings to the best of my knowledge, skills, and  
7 ability; that I am neither counsel for, related to,  
8 nor employed by any of the parties to the action in  
9 which this was taken; and, further, that I am not a  
10 relative or employee of any counsel or attorney  
11 employed by the parties hereto, nor financially or  
12 otherwise interested in the outcome of this action.

13  
14 

15 CHERYL MCKINNEY  
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[&amp; - beckham]

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Michigan Court Rules

Chapter 2: Civil Procedure

Subchapter 2.300 Discovery Rule 2.306

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